

FCC MAIL SECTION

## Modern Communications Corporation

1215 Sixteenth Street • Altoona, PA 16601 • (814) 944-2028

ORIGINAL  
FILE

March 5, 1991

RECEIVED

MAR 11 1991

Federal Communications Commission  
Office of the Secretary

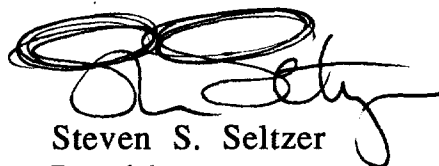
Ms. Donna Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20054

Dear Ms. Searcy:

Enclosed please find the comments I am herewith submitting in support of the Petition for Rulemaking (RM-7617) filed by Telocator on January 23, 1991. Telocator requests the Commission to release the 930-931 MHz advanced paging reserve band for a new generation of communications services called "Advanced Messaging Services" ("AMS").

Thank you for your consideration in this matter.

Sincerely,



Steven S. Seltzer  
President

SSS/jak  
Enclosures

No. of Copies rec'd  
List A B C D E

0 + 8

*Your Total Communications Company Since 1954*

- Telephone Answering Service
- Electronic Telephone Systems
- Two Way Radio Sales
- Radio Paging Service
- Agent-Cellular One®
- ADAM Voice Messaging
- Mobile Telephone Service
- 3M Sound Products
- Alarm Monitoring

# **Modern Communications Corporation**

**ORIGINAL  
FILE**

1215 Sixteenth Street • Altoona, PA 16601 • (814) 944-2028

In the Matter:

Telocator Petition for Rulemaking  
To Amend Part 22 of the Commission's Rules  
Concerning the Use of 930-931 MHz For  
An Advanced Messaging Service

RM-7617

**RECEIVED**

**MAR 11 1991**

Federal Communications Commission  
Office of the Secretary

Comments of  
Modern Communications Corporation  
and  
"The Personal Communications Companies"

Modern Communications Corporation and The Personal Communications Companies, are family-owned and operated businesses that provide radiotelephone and paging services to more than 4,000 customers in Pennsylvania, Maryland and West Virginia. These Companies are greatly concerned about the severe shortage of spectrum for application of advanced messaging services. Accordingly, we would like to express our strong support for Telocator's Petition for Rulemaking to Amend Part 22 of the Commission's Rules Concerning the Use of 930-931 MHz for an Advanced Messaging Service.

Since 1982 when the Federal Communications Commission reserved 930-931 MHz for future advanced paging systems, these Companies, and the paging industry as a whole, have experienced tremendous growth, both in terms of the number of subscribers and technological innovation. Modern Communications and The Personal Communications Companies have seen the paging industry evolve from a simple "beeper" service utilized by health care and service-oriented professionals to a sophisticated communications tool used by over 10 million subscribers, including business people, public officials, homemakers, and even children as a means of "staying in touch" with parents and caregivers.

The paging industry is now poised to enter a new era, an era in which paging will go beyond its traditional ability to "call alert." We believe this new era will see paging provide services such as voice and electronic mail, information and imaging services, to meet the

***Your Total Communications Company Since 1954***

- Telephone Answering Service
- Electronic Telephone Systems
- Two Way Radio Sales
- Radio Paging Service
- Agent-Cellular One®
- ADAM Voice Messaging
- Mobile Telephone Service
- 3M Sound Products
- Alarm Monitoring

ever growing demand by American business and consumers for efficient, low cost personal communications services. The phenomenal market penetration achieved by paging in the last decade will continue in the 1990's as paging services become increasingly sophisticated and as costs to the consumer and business person continue to decline.

We support Telocator's position that new services cannot be accommodated in spectrum already allocated for paging service. The largest paging markets already suffer from a lack of frequencies for existing paging service, and simply have no space for these new services. The advanced paging systems envisioned for use in the 930-931 MHz band, such as alphanumeric paging, have already been developed and put into service in the already overcrowded spectrum previously allocated for traditional paging services. Indeed, technological advances such as digital transmission have allowed paging providers to achieve remarkable efficiencies with spectrum already allocated for paging. Unfortunately, we have reached the limits as to accommodating increased growth through additional spectrum use efficiencies.

Modern Communications and The Personal Communications Companies believe that personal communications services now under development, such as PCN and CT-2, would be greatly facilitated by the complementary technology of advanced messaging services. AMS would allow PCS subscribers to surmount problems of differing networks and limited service areas that are bound to affect new PCS services. Paging service is already available on local wide-area, regional, and national paging networks. These services will fill the gaps in the new PCS services in a practical and cost effective manner. Conversely, to delay allocating 930-931 MHz for advanced messaging services would needlessly hinder these new personal communications services from operating at their full potential, which our Companies believe is not in the public interest.

We agree with Telocator that technical considerations bolster the argument for allocating 930-931 MHz for AMS. This spectrum is not suitable for CT-2 or LEO Satellite service, as shown by the muted support such an allocation has received by the carriers who seek to provide such services. However, this spectrum is well suited for the services that AMS will provide, which is why the Commission originally reserved this band between two assigned paging services in 1982.

We are also in agreement with Telocator's position that carriers should not be restricted as to the types of services they would be allowed to offer on frequencies designated for AMS.

The best way to encourage advanced messaging services would be to establish flexible regulatory policies. A broad regulatory framework that would promote digital transmission systems and manage interference would encourage qualified entrepreneurs to develop innovative messaging services. We believe that this approach will ensure that AMS develops in response to consumer demands and would therefore be in the best public interest.

Respectfully Submitted,

Modern Communications Corporation

and

The Personal Communications Companies

By:

  
Steven S. Seltzer, President